

**GREATER NEW BEDFORD ENVIRONMENTAL COMMUNITY WORK GROUP**

**Post Office Box 41112  
New Bedford, Massachusetts 02744**

October 13, 1989

Mr. Frank Ciavattieri  
HAN CAN 2  
JFK Federal Building  
Boston, Massachusetts 02203

Dear Mr. Ciavattieri:

The Greater New Bedford Environmental Community Work group submits the following comments on the Environmental Protection Agency's proposed plan of remediation for the First Operable Unit of the New Bedford Harbor Superfund Site, i.e., dredging and incineration of contaminated sediments from the Hot Spot, located in the upper estuary of the Acushnet River. We also offer comments on the capping alternative for the upper estuary offered by the PRP's through Rizzo Associates.

As you know, the Work Group is a volunteer committee of private citizens from the New Bedford-Acushnet-Fairhaven-Dartmouth area who have been monitoring the technical aspects of the cleanup alternatives being evaluated by EPA for the New Bedford Harbor Superfund Site. Our goal is to ensure citizens' input into EPA's decision making process as it concerns the harbor.

The Work Group has been meeting monthly for two years. We have heard technical presentations by EPA and others and have read most of the scientific and engineering documents produced relative to the cleanup effort. Through a Technical Assistance Grant awarded to us by EPA, we have been able to hire outside technical expertise to assist us in making an evaluation of the cleanup alternatives and the data which supports each possible choice.

More than half of our total membership offered comments on the two previously mentioned plans. Six members support EPA's proposed plan to dredge and incinerate Hot Spot sediments, while three members support the capping alternative offered by the PRPs. A formal statement of support for the alternative is submitted by each of these two groups. These statements are followed by individual comments. The Work Group Comment Document also contains a general statement supported by all participating members concerning the remediation work plan. This statement applies regardless of which cleanup alternative

is chosen by EPA.

Also enclosed is a document commenting on the Public Health Risk Assessment for the New Bedford Harbor. This risk assessment was evaluated, and the comments prepared, by our technical advisor, Environ, at the request of the Work Group.

We thank you for your attention to this matter.

Sincerely,

*Leon R. Chadwick*

Leon R. Chadwick  
Chairperson  
Greater New Bedford  
Environmental Community  
Work Group

enclosures  
cc: file

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Comments on: (1) EPA Proposed Plan for Operable Unit 1,  
New Bedford Harbor Superfund Site

(2) PRP alternative plan of capping for the  
upper estuary

DREDGING AND INCINERATION

Six Work Group members support the EPA proposal of dredging and incineration as the remedial alternative for the Hot Spot.

General Statement:

We support the EPA's proposal to dredge the Hot Spot and incinerate the contaminated sediments. We feel this remedy offers an efficient and permanent solution to the cleanup of the Hot Spot, which is the most highly PCB-contaminated area in the entire Superfund Site. We also feel that capping is a feasible technology for less contaminated areas of the Superfund Site and should be included in the

choice of remedial alternatives for Operable Unit 2.

**Individual Comments:**

\* Dredging should proceed on an incoming tide and no other, and should cease one hour prior to the change of said tide.

\* During all periods of dredging, water quality must be monitored by use of an appropriate indicator species and/or chemical analysis, with sampling to be done in locations that extend to the New Bedford Hurricane Barrier.

\* The air quality of communities surrounding the cleanup site should be monitored to detect possible PCB volatilizations during dredging operations, as well as possible PCB byproducts or metals volatilizations produced during incineration.

\* The PCB concentration in effluent water produced during sediment dewatering should be subject to the same discharge requirements as those applied to local industries.

\* EPA has not made specific, satisfactory arrangements to deal with the strong possibility that incinerator ash will contain hazardous levels of metals. Considering their plan to temporarily dispose of the incinerator ash on-site, in the unlined CDF, this is a disturbing omission.

The immobilization of metals by solidification of incinerator ash is a new technology without a proven track record. A second point: how "temporary" will temporary disposal be?

#### **UPPER ESTUARY CAPPING**

Three Work Group members support the capping alternative for the upper estuary.

#### **General Statement:**

Being a community work group, we feel we must decide what is best for the community. We can understand other group members preference for dredging and incineration of Hot spot sediments, and would agree with them providing that in the Second Operable Unit, capping is the alternative chosen. However, we feel there is a possibility that capping may not even be offered as an alternative to deal with contaminated sediments in the remaining Superfund Site.

Therefore we have to take the worst case scenario, just as EPA did on the Public Health Risk Assessment: THE CLEANUP OF THE upper estuary, harbor and lower harbor could cost as much as \$900 million. At this price tag, we feel Aerovox and Cornell-Dubilier would be out of business, resulting in the loss of more than 1,000 jobs in the Greater New Bedford area.

We feel that capping, the alternative offered by the PRPs through Rizzo Associates, is a complete alternative and we give our support to this plan.

**Individual Comments:**

\* EPA hasn't given a fair shake to all the alternatives and would not have even considered the capping alternative without pressure being brought to bear.

\* EPA has seriously underestimated the \$15 million price tag for dredging and incineration. Also, treatment of dewatering effluent may be a serious problem.

\* EPA should have given biodegradation a closer examination.

\* There are doubts concerning PCB incineration as this technology has the potential to contribute to air pollution, as well as the fact that the American public isn't ready to endorse this technology. Lack of public support may cause delay.

**GENERAL GROUP STATEMENT**

\* We insist upon a timely examination of EPA's work plan for the chosen alternative. This work plan should be made available to us and

our technical advisor in time to permit thorough examination and comment.

\* We insist that failure in any part of the remedial project as it applies to the Hot Spot, resulting in an increase of PCBs in the air or water, is grounds for EPA to cease and desist this project until the problem is clearly identified and corrected.